

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re: James L. Garland, Jr. and  
Marci Jo Garland

Debtor,

JPMorgan Chase Bank, N.A.

Movant,

James L. Garland, Jr., Marci Jo Garland,  
and Ronda J. Winnecour, Chapter 13  
Trustee

Respondents.

Case No. 16-20204-JAD

Chapter 13

Document No. \_\_\_\_  
Related to Doc. Nos. 56, 57  
Related to Claim No. 18

**CONSENT MOTION FOR AN ORDER CONTINUING HEARING AND  
EXTENDING TIME FOR JPMORGAN CHASE BANK, N.A. TO RESPOND TO  
DEBTORS' OBJECTION TO NOTICE OF MORTGAGE PAYMENT CHANGE**

JPMorgan Chase Bank, N.A. ("JPMorgan"), hereby moves (this "Motion") the Court for the entry of a consent order, substantially in the form attached as **Exhibit A**, continuing the hearing on, and extending the deadline for JPMorgan to respond to, the *Objection to Notice of Mortgage Payment Change* [Doc. No. 56] (the "Objection") filed by Debtors James L. Garland, Jr., and Marci Jo Garland (the "Debtors") on February 23, 2021, and in support hereof, states as follows:

1. On January 25, 2016, the Debtors filed a voluntary petition for relief under chapter 13 of title 11 of the United States Code, 11 U.S.C. § 101 *et seq.*, in the United States Bankruptcy Court for the Western District of Pennsylvania (the "Court").

2. On August 16, 2016, the Court confirmed the Debtors' Chapter 13 Plan dated January 25, 2016, as modified at the confirmation hearing.

3. On February 2, 2021, JPMorgan filed a Notice of Mortgage Payment Change in connection with Claim No. 18 (the "Notice").

4. On February 23, 2021, the Debtors filed the Objection, requesting that the Court deny the Notice.

5. The current deadline to respond to the Objection is March 12, 2021, and a hearing on the Notice and the Objection is currently scheduled for March 31, 2021 at 10:00 a.m. (prevailing Eastern Time). See Doc. No. 57.

6. JPMorgan intends to engage in discussions with the Debtors concerning an amicable resolution of the Notice and the Objection.

7. Accordingly, counsel for JPMorgan contacted counsel for the Debtors to request Debtors' consent to an extension of time to respond to the Objection. From that discussion, counsel for the Debtors consented to a 14-day extension of time for JPMorgan to respond to the Objection.

8. Consistent with the parties' agreement, JPMorgan respectfully requests a 14-day extension of time to respond to the Objection through and including March 26, 2021. The Debtors consent to the relief requested in this Motion.

WHEREFORE, JPMorgan respectfully requests that this Court enter an order, substantially in the form attached as **Exhibit A**, (i) granting the Motion, (ii) extending JPMorgan's time to respond to the Objection through and including March 26, 2021, (iii)

continuing the hearing on the Notice and the Objection to April 14, 2021 at 11:00 a.m.  
(prevailing Eastern Time) or to a date and time thereafter convenient for the Court, and (iv)  
granting such other and further relief as may be just and proper.

Dated: March 12, 2021

Respectfully submitted,

REED SMITH LLP

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Consented to by:

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